

**Federal Defenders
OF NEW YORK, INC.**

Southern District
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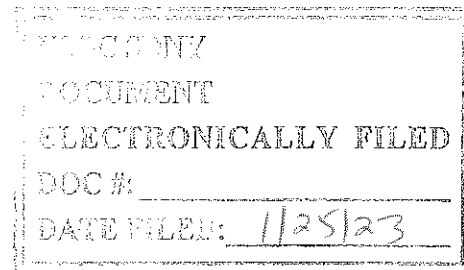
David E. Patton
Executive Director
and Attorney-in-Chief

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 20, 2023

VIA ECF

Honorable Judge Richard M. Berman
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007



**Re: United States v. Stefan Melville
22 CR 456 (RMB)**

Dear Judge Berman:

On behalf of defendant Stefan Melville, I write to respectfully request a 30-day extension of the deadline for defense motions in this case to February 20, 2023. This is the second request for an extension of time of the motion deadline. The last deadline was December 20, 2022, in advance of which I requested an unopposed 30-day extension of the deadline, which the Court granted.

In addition, I write to request that the Court adjourn the status conference in this case currently scheduled for February 1, 2023, by 30 days. I have reached out to AUSA Jeffrey Coyle regarding this request and understand the government consents to both requests.

The basis for these requests is primarily due to defense counsel's scheduling conflicts. I have been unable to meet with Mr. Melville to discuss a pretrial resolution in this matter due to travel over the Christmas/New Year holiday and being in trial the first full week in January. In addition, I am in the process of transferring this case within Federal Defenders of New York, as I will imminently be starting parental leave. I therefore respectfully request another 30-day adjournment of the briefing schedule in this matter, and a 30-day adjournment of the status conference, in order to allow defense counsel adequate time to discuss a pretrial resolution with Mr. Melville and confer with new counsel.

As noted above, the government consents to these requests. It further seeks, and the defense consents to, the exclusion of time under the Speedy Trial Act to February 20, 2023, the proposed date of the new motion deadline, pursuant to 18 U.S.C. § 3161(h)(7). The exclusion of time will allow defense counsel time to meet with Mr. Melville to discuss a resolution to this case and will permit new defense counsel time to properly review discovery and prepare any defensive motions.

Sincerely,

/s/ Hannah McCrea
Hannah McCrea
Assistant Federal Defender
(646) 574-0351

CC: AUSA Jeffrey Coyle

Extensions granted. Status
conference is scheduled for
3-8-23 at 10:00am. Time
is excluded pursuant to the
Speedy Trial Act for the
reasons set forth in this
letter.

SO ORDERED:

Date: 1/25/23

Richard M. Berman
Richard M. Berman, U.S.D.J.